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8 Attorneys for Plaintiff
9 KATHY DEOCAMPO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 KATHY DEOCAMPO,

13 Plaintiff,

14 v.

15 CALIFORNIA DEPARTMENT OF
16 CORRECTIONS, EDWARD S.
ALAMEIDA, JR., JEANNE S.
WOODFORD, AND DOES 1-25,
INCLUSIVE,

17 Defendants.

Case No. C 04-03018 MMC

STIPULATION REQUESTING
ADDITIONAL 30-DAY CONTINUANCE
OF CASE MANAGEMENT CONFERENCE
AND ~~PROPOSED~~ ORDER

Date: August 12, 2005

Time: 10:30 a.m.

Courtroom: 7

Judge: Honorable Maxine M. Chesney

18 Pursuant to the Court's Order and Civil L. R. 16-9, the parties jointly submit this
19 Stipulation requesting a 30-day continuance of the Case Management Conference on the ground
20 that all parties are in the process of negotiating in good faith to reach a global settlement of all of
21 plaintiff's claims.
22

23 DESCRIPTION OF THE CASE

24 Plaintiff was an employee for the California Department of Corrections, and most
25 recently was employed as a Correctional Case Records Analyst at San Quentin State Prison. The
26 plaintiff, Kathy DeoCampo, filed this lawsuit on July 26, 2004, alleging retaliation in violation of
27

1 Title VII, 42 U.S.C. § 2000(e), retaliation for First Amendment activities under 42 U.S.C. § 1983
 2 and pendent claims under California Government Code §§ 12940, et seq. The defendants
 3 answered on August 18, 2004.

4 The plaintiff's related Workers' Compensation claim is schedule for trial on September
 5 27, 2005. The parties will be conducting final settlement negotiations, and if that fails, try the
 6 case. This Court granted a stay in this action and continued the last Case Management
 7 Conference so that the parties could report on the state proceedings.

8 In addition, counsel for plaintiff has two simultaneous appearances the morning of
 9 August 12, 2005 in state and federal court.

10 STIPULATION

11 Given that the parties continue to be engaged in good faith settlement negotiations from
 12 the present through the September 27, 2005 trial date in the plaintiff's Workers' Compensation
 13 case, the parties respectfully request this Court grant an additional stay of 45 days.

14 RESPECTFULLY SUBMITTED,

15 THE SCOTT LAW FIRM

16
 17 DATED: August 5, 2005

18 By: 

JOHN HOUSTON SCOTT
 Attorney for Plaintiff

19 BILL LOCKYER
 Attorney General of the State of California
 20 FIEL D. TIGNO
 Deputy Attorney General

21
 22 DATED: August 8, 2005

23 By: 

FIEL D. TIGNO
 Deputy Attorney General
 Attorney for Defendants


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ORDER

IT IS HEREBY ORDERED that the Case Management Conference set for August 12, to September 23, 2005. 2005 be continued ~~for 45 days~~. A joint case management statement shall be filed no later than 7 days before the new Case Management Conference.

DATED: August 9, 2005


HON. MAXINE M. CHESNEY
JUDGE OF THE
UNITED STATES DISTRICT COURT